

U.S. EPA Region 1 New England Single Media and Multi Media Inspection Highlights

U.S.N. Portsmouth Naval Shipyard, Portsmouth, N.H.

US EPA Region 1 New England Federal Facilities combined single-media and multi-media inspection reports:

- 1. Single-media: June 27-28, 2006. Areas inspected: RCRA.**
- 2. Multi –Media: May 12-13, 2008. Areas inspected: CAA (Asbestos/NESHAP); RCRA.**

Areas of Environmental Concern:

1. Inspection: June 27-28, 2006. RCRA

- **Building #357(Licensed Storage Area)**
 - **Room #126**
 - One 55-gallon container substantially dented. Base personnel exchanged container
- **Building #20 (Materials Test Lab and Print Shop)**
 - **Room #309**
 - One 30-gallon container marked as misc. acid waste, 6/9/06. Needs to be marked with waste codes or a description of the hazard posed by the waste.
 - One 30-gallon container marked as paint wipes/rags, 6/9/06. Needs to be marked with waste codes or a description of the hazard posed by the waste.
 - **Room #339**
 - The area was being managed as a satellite accumulation area even though the container wasn't stored at or near the point of generation of the waste. The area needs to be managed as a less-than-90-day storage area.
- **Building #60 (Rubber and Plastic Shop)**
 - One 1-gallon bucket containing spent blasting media needs to be properly labeled. The inspection team suggested labeling the container with a non-regulated waste label and requested a copy of the waste determinations for the spent blasting debris.
 - One 55-gallon container connected to a dust collector needs to be properly labeled. The inspection team suggested labeling the container with a non-regulated waste label.
- **Building #320 (Morale, Welfare and Recreation Hobby Shop)**
 - Waste determinations need to be conducted on spent fuel filters and brake pads because of benzene in gasoline and barium and other regulated metals sometimes found in brake pads.

- **Storage Shed 71-12**

- One 10-gallon container marked as hazardous waste, plating solution, pH<2 needs to be marked with an accumulation date.

- **Building #174-1 (Storage Area)**

- One 10-gallon accumulation needed to be labeled. During the inspection a facility attendant labeled the container as non-regulated waste.

- **Building #240 (Electrical Shop)**

- One 1-gallon container marked as universal waste, batteries. The container needs to be dated.

- **Building #151 (Production Shop)**

- A yellow hopper containing dust/grit material located outside building was not labeled. A facility member stated that the contents of the hopper is profiled and managed as non-regulated waste. The inspection team requested to review this profile during their records review.

- **Building #31 (Plating Shop)**

- A sink used to rinse plating equipment after completion of a plating job needs to be covered when waste is not being added or removed.

2. Inspection: May 12-13, 2008.

CAA (Asbestos/NESHAP)

- **Building # 357 – Central Hazardous Waste Transfer Facility**

- At least two, approximately 35-gallon (4.7 ft³), polyethylene bags contained dry, friable asbestos material which was not sealed in leak-tight containers. The asbestos material in the bags needed to be double-bagged.

RCRA

- **Awaiting report**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
1 Congress Steet, Boston, MA 02114

MEMORANDUM

DATE: August 15, 2006

SUBJ: RCRA Inspection - Portsmouth Naval Shipyard, Kittery, ME

FROM: Andrew Meyer, Environmental Scientist
RCRA Compliance Unit

THRU: Lisa Papetti, Senior Enforcement Coordinator, RCRA/EPCRA & Federal Compliance Unit

TO: File

GENERAL INFORMATION:

Facility Name and Address:

US Navy, Portsmouth Naval Shipyard (PNS)
Seavey Island
Kittery, ME 03804

RCRA Contact:

Kenneth Plaisted, Environmental Coordinator
(207) 438-2558

Date of Inspection:

June 27-28, 2006

Purpose of Inspection:

RCRA Federal Facility Inspection

Personnel Participating in Inspection:

U.S. EPA - Andrew Meyer, RCRA
Richard Hull, RCRA¹
Anne Fenn, Federal Facilities Program

PNS - Kenneth Plaisted, Environmental Coordinator
Dennis Dubois, Health and Safety
Dennis Gagnon, HW Facility Operator
Robert Burley, Environmental Engineering

¹ Richard Hull participated in the inspection only on June 28, 2006.

Portsmouth Naval Shipyard
Trip Report
USEPA

Steve Koske, PNS

RCRA Reporting/Information Requirements:

- Facility ID No.: ME7170022019
- Type of Operation: LQG, TSD
- Notification of Hazardous Waste Activity: 8/18/80
- Part A Submittal: 11/7/80
- Amended Part A: 7/7/83
- Part B Submittal: 11/16/83

FACILITY DESCRIPTION

The Portsmouth Naval Shipyard repairs and maintains nuclear submarines and other naval vessels. The shipyard, established in 1800, has been commissioned for shipbuilding at various times since the Civil War, and since World War II, has been a support facility, primarily for nuclear powered vessels.

The shipyard has over 350 buildings on 278 acres that house dedicated shops for welding, sheet metal work, piping, mechanics, electrics, painting, machining, vehicle maintenance and other activities. The facility also operates as a licensed storage facility for both the storage of hazardous waste, and mixed radioactive waste. Some of these activities occur in a Controlled Industrial Area (CIA) that includes berths and dry docks for nuclear submarines and other vessels.

Activities at the shipyard that generate hazardous wastes include painting, paint stripping, and sandblasting, degreasing, and metal finishing operations, metal forging, and machining, coating, and maintenance and equipment repairing. The Base has numerous satellite accumulation points at various shop locations.

GENERAL OBSERVATIONS

Opening Conference:

The inspection team arrived at the facility and were met at the gate provided credentials to Mr. Kenneth Plaisted, Environmental Coordinator. Mr. Plaisted escorted the inspection team to a conference room with seven PNS employees present. The Base Commander was not present at any time during the inspection. Ms. Fenn gave a prepared pre-inspection presentation that included the following: introductions between inspectors and key PNS personnel; the goals of the Federal Facility Inspecting Team and the purpose of the inspection; why the facility was chosen to be inspected; a brief description on the items of interest to inspectors; a brief description on how inspectors intended on conducting the inspection; a brief summary on the results of past Federal Facility inspections; and the range of responses that can result from the inspection. Anne Fenn concluded the pre-inspection in-briefing by providing attendees with handouts on the Federal Facilities program. Logistics on how inspectors would conduct the inspections over the next few days were arranged.

After the opening conference, the inspection team was escorted by Mr. Koske and Mr. Burley to Building # 357, location of the licensed storage area.

Building #357

Mr. Burley explained that the entire building was designed and built specifically to be used as a hazardous waste storage facility. Mr. Burley explained that the building is lined with a landfill-quality plastic liner, 6 feet below the building and is licensed to store hazardous waste for up to 180 days. The liner is equipped with automatically alarmed leak detection. The facility is primarily designed for 55-gallon drum and cubic-yard tote storage and is licensed to store 259 55-gallon containers of hazardous waste. The facility is licensed to accept hazardous waste from any Department of Defense (DOD) facility in New England. Most of their waste is generated on-site, or received from the Brunswick Naval Shipyard or from the Pease Air and Army National Guard facilities. Receipt is primarily via waterway. The facility operates as a commercial storage facility. Everything that is accepted must first be profiled to ensure that the license allows the waste to be accepted. Each room is equipped with its own secondary containment to prevent commingling of spilled materials/wastes. Where explosive chemical wastes are stored, walls are equipped with explosive vents.

In Room # 124 of Building #357 the facility operates a "loose pack" area, which is used to accumulate and consolidate similar type hazardous wastes into 55-gallon drums. In this room, the inspection team documented the following containers, with hazardous waste labels. These containers were either filled, or in the process of being consolidated:

# of containers	volume or size	description on label	date of accumulation
1	55-g	adhesives	6/7/06
3	55-g	paint	6/7/06
1	55-g	antifreeze	none
1	55-g	oil	none
1	55-g	grease	none
1	30-g	spray cans	none
1	55-g	floor wash high pH	6/7/06
1	55-g	rags/rollers	3/27/06
2	4' box	fluor bulbs	6/6/06
3	4' box	fluor bulbs	6/6/06
1	55-g	mercuric waste	4/10/06
1	55-g	hypo solution	6/19/06
1	55-g	alkaline sol	6/13/06

The next room (room number not documented) was used to store 1-cubic-yard totes. The following containers, all marked as hazardous waste, were observed:

# of containers	description on label	date of accumulation	waste code
4	hw sold	5/15/06	D006,D007,D008,D009
		6/7/06	D006,D007,D008,D009
		4/26/06	D006,D007,D008,D009
		3/30/06	D006,D007,D008,D009
5	hw SHT tiles	6/12,15,14,16,17/06	D008
11	hw abrasive blasting dust	6/5,5,5/06, 4/5,24,5,24,24/06, 5/16,16/06	D004,D006,D007D008, D010
1 (55-gallon cont)	ballasts, PCBs	2/7/06	

Next, the inspection team inspected Room #126, Class 7 liquids. The following 55-gallon containers were documented:

# of containers	description on label	date of accumulation	waste code
13 ²	hw coolant and water	not documented, but noted that all in 5/06 and 6/06.	D004, D006, D008
3	hw floor cleaning	4/11,12/06, 5/15/06	D006,D008,D010
2	hw hypo solution	3/22/06	D06,D007,D009,D010,D011
1	liquids, non-regulated, non-combustible	no date	MA99 ³

Next, the inspection team proceeded to Room #127A, Water Reactives. The following containers were documented in the area:

²One 55-gallon container was substantially dented. Base personnel immediately transferred the container to a suitable 55-gallon container.

³Requested profile (9005, 9052)

# of containers	volume	description on label	date of accumulation	waste code
1	20-gallon	hw, magnesium turnings	6/6/06	D001,D003
1	5-gallon	universal waste, lithium batteries	12/21/05	none

Next, the inspection team proceeded to Room #127, Oxidizers. The following containers were documented in this area:

# of containers	volume	description on label	date of accumulation	waste code
1	55-g	hw, oba cannister	4/11/06	D001
1	30-g	hw, catalysts, carbon monoxide	5/3/006	D001
1	30-g	hw, hydrogen peroxide	4/5/06	D001
1	5-g	hw, sodium/potassium chlorate	4/21/06	D001

Next, the inspection team proceeded to the remaining rooms in Building #357 including the Universal Waste Storage Room, Acid/Batteries Storage Room, Miscellaneous Paint Room, and a room used to store empty containers. No concerns were noted in these areas. Before leaving the area, Andrew Meyer reviewed manifests for the licensed facility.

Next, the inspection team proceeded to Building #20, the Materials Test Laboratory and Print Shop, where PNS operates a number of satellite accumulation areas. At Room #309, PNS operates a less than 90 day storage area where the following containers were observed:

one 30-gallon container with a hazardous waste label marked as misc. acid waste, 6/9/06. This container was not marked with waste codes or a description of the hazard posed by the waste; and

one 30-gallon container with a hazardous waste label marked as paint wipes/rags, 6/9/06. This container was not marked with waste codes or a description of the hazard posed by the waste.

The inspection log for this storage was reviewed. No concerns were noted.

In Room #316, the inspection team observed miscellaneous analytical equipment including ICP/MS units and IM chromatography units. Analytical devices were directly connected to 1-gallon containers that were appropriately labeled and equipped with secondary containment.

In Room #339, the inspection team observed an area used to accumulate hazardous liquids that are used in the field to test for metals. Once used, they are returned to this location and disposed of as hazardous waste. The area was being managed as a satellite accumulation area, even though the container wasn't stored at or near the point of generation of the waste. The one 5-gallon container used to accumulate this waste stream was labeled "hazardous liquids" and was properly closed and stored in secondary containment. The inspection team discussed satellite container requirements and Mr. Burley stated that they would begin managing the area as a less-than-90-day storage area.

Before proceeding to the Printing Office in Building #20, the inspection team observed the organic and inorganic product storage areas. No concerns were noted.

At the Printing Office in Building #20, PNS conducts photographic and printing processes including photoengraving on aluminum plates. The inspection team observed one 1-gallon container directly connected to the photographic equipment. This container was marked with a hazardous waste label, stored in a secondary containment tray and marked as hypo container. Also stored in this secondary containment tray was one 5-gallon container marked hypo solution. Inspection logs for this area were observed and were routinely conducted and documented by David Dryman and Richard Bran.

Next, the inspection team proceeded to Building #60, the Rubber and Plastic Shop. Two operations are performed in this building. The first activity is blasting of small parts to be coated with rubber and/or plastic. The second activity is the fabrication or covering of parts with rubber or plastic. The inspection team learned that the shop applies protective plastic and rubber coating on metal parts such as valves by dipping the parts in liquid plastic and rubber coatings. The waste generated here is from the plastic dipping process. Pieces of equipment are dipped into containers and held over the tanks until the dripping stops. The pieces are then dried in an oven. The inspection team observed the following satellite containers:

one 5-gallon container marked as hazardous waste, miscellaneous oil and dated 6/2/06; and

one 1-gallon container marked "green teflon", corrosive, 4/1/06;

one 1-gallon bucket that was unlabeled. A worker in the area stated that it contained spent blasting media. Mr. Burley stated that the spent blasting media was tested and determined to not contain any regulated constituents. Furthermore, Mr. Burley stated that when parts with lead are blasted, the spent media is managed as hazardous waste but said that the materials containing lead are no longer frequently used. The inspection team suggested labeling the container, at least with a non-regulated waste label and requested a copy of the waste determinations for the spent blasting debris;

one 55-gallon container connected to a dust collector. Mr. Burley stated that the system is used to collect the spent rubber. Mr. Burley stated that the dust is non-regulated. The inspection team suggested labeling the container with a non-regulated waste label;

one small tote used to accumulate empty aerosol cans. This container was labeled as hazardous waste, aerosol cans, 5/9/06;

one 5-gallon container with a hazardous waste label, solvent, 5/9/06;

one 55-gallon container with a hazardous waste label described as rags, rollers, 6/20/06; and
one 5-gallon container marked with a hazardous waste label, epoxy paint, 5/22/06.

Inspection logs for the area were reviewed with no concerns noted. This ended the first day of the inspection.

On the second day of the inspection, the inspection team was joined by Richard Hull, EPA. The inspection team divided into two teams. Andrew Meyer, Anne Fenn and Mr. Burley comprised one group (Team #1) and Richard Hull and Mr. Beaudoin, comprised the other group (Team #2).

Team #1 began Day #2 at Building #320, the Morale, Welfare, & Recreation Hobby Shop. Mr. Burley explained that the shop is basically used for people on the base to come in and work on their own cars. The shop contracts with an independent automotive mechanic that can be hired to do auto repair work. The shop does not allow any body work to be conducted on its premises. The shop has one Safety Klean partswasher that is serviced by Safety Klean as part of a contractual agreement. Spent batteries are collected when new batteries are purchased. Attendants stated that fuel filters are not collected and therefore must get disposed of in the trash. He also stated that spent brake pads are disposed of in the trash. The inspection team explained the need to conduct waste determinations on spent fuel filters and brake pads because of benzene in gasoline and barium or other regulated metals sometimes found in brake pads. Additionally, the inspection team observed the following containers with hazardous waste labels:

one 55-gallon container marked as antifreeze, 6/14/06;
one 55-gallon container marked as used motor oil, 6/15/06;
one 55-gallon container marked as oil filters;
one 55-gallon container marked as used oily rags; and
one 55-gallon container marked as used speedi-dry.

Before leaving the area the inspection team looked at the parts supply room and observed no chlorinated products being used.

Next, Team #1 proceeded to the Base Hospital. In Room #30, Darkroom Radiology, the inspection team observed an area marked as "universal hazardous waste storage area". The following containers were observed in this area;

two 5-gallon containers hooked up directly to the photographic developing equipment. One of the containers was marked with hazardous waste labels as developer, the other was marked as fixer. Inspection logs for the area were reviewed with no discrepancies noted.

Next, Team #1 visited the hospital's pharmacy and learned that expired medicines are managed by Guaranteed Returns (100 Colin Drive, Holbrook, NY 11741-2138, phone 800 473 2138), a reverse distribution company. Andrew Meyer reviewed a copy of the inventory for the last shipment which included a shipment of ipraxtropbin bromide inhalation, fluoxetine HCl, propranol HCl, thiodazine HCl.

Before leaving the hospital, Team #1 visited the Radiological Counting Lab. No wastes were observed.

Next, Team #1 Proceeded to Building #154, Transportation Equipment Maintenance. Mr. Burley explained that most of the vehicles used on the base are GSA vehicles that are contracted to PNS. The following containers with hazardous waste labels were observed in this building:

one 55-gallon container marked as used oil, 5/3/06; and

one 55-gallon container marked as floor sweepings/rags.

Inspection logs for the area were reviewed with no discrepancies noted.

Next, after clearing security, Team #1 proceeded to the Controlled Industrial Area (CIA). Mr. Burley explained that Building 285 is the sand blast and painting building where large pieces of equipment which are sand blasted and repainted, have the paint removed.

At a shed outside of Building #285, Team #1 observed two 1-cubic yard boxes being used to accumulate SHT tiles. One of the boxes was empty. The other box was labeled with the words hazardous waste, SHT Tiles, 6/26/06. Inspection logs for the area were reviewed with no discrepancies noted.

Next, Team #1 proceeded to Storage Shed 71-12, the main storage area for wastes generated in PNS's painting operations. The following containers were observed:

one 55-gallon container marked as non-regulated waste, "polysulfide, waste stream 9061. The attendant stated that the waste stream was only part B of a two part epoxy.

one 55-gallon container marked as hazardous waste, lead debris, 5/19/06;

one box marked universal waste, fluorescent lamps;

one 5-gallon container marked as hazardous waste, paint excess, 6/22/06;

one 5-gallon container marked as hazardous waste, aerosol cans, 5/5/06;

one 55-gallon container marked as hazardous waste, polysulfide, 6/27/06. The attendant explained that the waste is the resulting mixture of both parts of the epoxy;

one 55-gallon container marked as hazardous waste, oil, 6/27/06;

one 55-gallon container marked as non-regulated waste, oily rags;

one 55-gallon container marked as non-regulated waste, grease;

one 10-gallon container marked as hazardous waste, plating solution, pH <2. This container was not marked with an accumulation date;

one 55-gallon container marked as hazardous waste, paint solvent, 9/26/06;

one 55-gallon container marked as hazardous waste, misc paint, 6/6/06;

one 55-gallon container marked as hazardous waste, rags roller, 6/28/06; and

one 55-gallon container marked as hazardous waste, epoxy paint, 6/23/06.

Inspection logs for the area were reviewed with no issues noted.

Next, the inspection team proceeded to an adjacent storage area identified by Mr. Burley as Building #174-1. Mr. Burley explained that the area was used to store materials that are removed from the hazardous material storage such as old off-specification materials or materials that are determined to be no longer used by PNS. The area had both less-than-90-day and greater-than-90-day hazardous waste containers. The area was adequately equipped with appropriate signage, emergency posting, and spill and fire response equipment. Inspection logs for the previous two months were reviewed with no discrepancies noted. The inspection team observed the following containers with hazardous waste labels:

one 10-gallon accumulation container marked as misc. solvents, profile 9035;

one 10-gallon accumulation container marked as scaling compound, profile 9065;

one 10-gallon accumulation container that was not labeled. During the inspection, the attendant in the area labeled the container as non-regulated waste, flux brazing compound, profile 9135;

one 10-gallon container marked as universal waste, NiCd batteries;

one 5-gallon container marked as acid solutions, 6/21/06;

one 5-gallon container marked as universal waste, flour lamps;

one 10-gallon container marked as solvents, 6/12/06;

one 10-gallon container marked as calcium hypochlorite, 6/13/06;

two 10-gallon accumulation containers marked as paint wastes;

one 10-gallon container marked as drano and rags;

one 30-gallon container marked as hazardous waste, aerosol cans, 6/13/06

two 5-gallon containers marked as hazardous waste, misc. paints;

one 10-gallon container marked as universal waste, capacitors; and

one 10-gallon marked as paint rollers, 5/24/06.

Next, team #1 proceeded to Building #92-1, Structural. The inspection team observed an area identified as a hazardous waste storage area, but at the time of the inspection no wastes were being accumulated.

Next, the team proceeded to the Paint Shop, Building #18. The following containers were observed:

one 1-cubic yard box marked as hazardous waste, SHT tiles, 6/12/06;
one 55-gallon container marked as hazardous waste, polysulfide, 6/19/06;
one 55-gallon container marked as hazardous waste, waste oil, 6/19/06;
one 55-gallon container marked as hazardous waste, waste solvents, 6/26/06;
one 55-gallon container marked as hazardous waste, rags, brushes, 6/12/06;
one 30-gallon container marked as hazardous waste, aerosol cans, 6/15/06;
one 55-gallon container marked as hazardous waste, lead debris, 4/27/06;
one 55-gallon container marked as hazardous waste, misc. paint, 5/16/06;
one 55-gallon container marked as hazardous waste, PCB debris, 6/27/06. The attendant explained that any waste that even has a small potential for containing any level of PCB is assumed to be hazardous waste by PNS;
three 55-gallon containers marked as hazardous waste, rags, brushes, dated 6/16/06, 6/22/06, and 6/26/06;
one 55-gallon container marked as hazardous waste, solvent, 5/8/06;
one 55-gallon container marked as hazardous waste, waste epoxy, 6/1/06;
one 10-gallon container marked as hazardous waste, used epoxy, 6/1/06; and
one 10-gallon container marked as hazardous waste, adhesives, 6/7/06.

Inspection logs were reviewed for the area.

Next, Team #1 proceeded to Building #240, Electrical Shop. The following container were observed;

one 10-gallon container marked aerosol cans, 6/22/06;
one 10-gallon container marked as non-regulated, solid varnish resins;
one 1-gallon container marked as universal waste, batteries. This container was not dated;
one 55-gallon container marked as non-regulated, waste oil;
one 10-gallon container marked as hazardous waste, lead debris, 6/27/06; and
one 10-gallon container marked as hazardous waste, sulfuric acid, 6/27/06.

Next, Team #1 received a briefing by the PNS Mixed Radiation Program and proceeded to Building #96, which is part of PNS's Part B license. The following containers were observed:

one 55-gallon container marked as mixed hazardous waste, lead contaminated debris, 3/13/06;

one 30-gallon container marked as mixed hazardous waste, paint chips with heavy metals, 8/30/05;

one 55-gallon container marked as solid waste containing heavy metals and or PCBS, 3/2/05.

Daily inspection logs were reviewed. Training records for PNS employees managing mixed radioactive wastes were provided and reviewed after the inspection. No issues were noted. Hazardous waste manifests for recent shipments of mixed radioactive wastes were observed. All manifests were signed by John Ford. No concerns were noted in the manifests.

On 6/28/06, Team #1 was joined by Team #2 comprised of Skip Hull and his escort, Steve Korish.

Team #2 began the day at the Defense Reutilization and Marketing Services Office (DRMO). At Building #136, Team #2 met Lester Leith. Mr. Leith explained that PNS's DRMO services ME, NH, and part of NY, but that the facility is in the process of closing the operations for receiving materials for reutilization, but will continue to serve as a screening center. Mr. Leith explained that the last receipt was on 6/16/06, and that in the future, they will serve only as a transfer facility, transferring from a receipt truck, to a transport truck that will bring materials to a DRMO in Pennsylvania. Mr. Leith explained that PNS's DRMO is not equipped to accept hazardous waste for storage.

The DRMO handles any material that is not taken through the DRMO screening process at Building #131. These materials are then auctioned to the public through Global Auctions.

Scrap metal and large items are collected and stored in roll-offs at the DRMO Salvage area. Mr. Leith explained that they have a mixed metal contract for recycling, and also collect and recycle anode corrosion zinc from naval ships. Other metals recycled through this service includes titanium and copper wire.

Next, Team #2 proceeded to Building # 151, the Production Shop. The inspection team observed a yellow hopper containing dust/grit material outside of the building. This container was not labeled. Mr. Korish stated that he wasn't sure where the waste came from, but that it is a recurrent waste stream that is profiled and managed as a non-regulated waste. The inspection team requested to review this profile during their records review.

In Building #151, at the Forklift Shop, Team #2 observed the following containers at an area identified as HWAA 151-1:

one 55-gallon container marked as hazardous waste, antifreeze, 4/10/06;

one 10-gallon container marked as hazardous waste, aerosol cans, 4/10/06;

one 55-gallon container marked as hazardous waste, used oil, 6/21/06; and

one 10-gallon tote marked as hazardous waste, used filter, 5/10/06.

This area was properly posted and equipped with proper emergency response equipment. Inspection logs for the area were observed with no issues noted.

Next, Team #2 proceeded to Building #300, the Machine Shop. The team observed baggers used to store metal filings and dust for scrap recycling outside of the area. Mr. Korish explained that the shop is equipped with six Safety Kleen partwashers that are serviced by Safety Kleen on a contractual basis. Wastes from the partwashers are managed as hazardous waste. Additionally, Mr. Korish explained that PNS has obtained a permit from MEDEP to recycle waste coolant, but the recycling activity has not yet been initiated by PNS.

At HWAA #300-1, the inspection team observed the following accumulation containers:

one 55-gallon container marked as hazardous waste, dirty floor water, 6/20/06;

one 55-gallon container marked as non-hazardous waste, dirty jet machine water, profile #801;

one 55-gallon container marked as hazardous waste, dirty scrap water, 5/25/06, profile #8011. Mr. Korish explained that PNS's 8000 and 9000 series profiles are all non-hazardous wastes;

one 55-gallon container marked as hazardous waste, dirty coolant water, 6/27/06, profile 4007; and

one 55-gallon container marked as hazardous waste, used dirty oil, 6/7/06 oil.

Next, Inspection Team #2 visited Shop #31, the Plating Shop, and met Steve Bill, Plating Supervisor. The team learned that the shop has three trained platers who perform electroplating jobs on various items needing repair, primarily nickel and copper plating. When a job is completed, the plating equipment is rinsed at a sink and allowed to accumulate in the sink until the end of the day. At the end of the day, the sink's contents are transferred to a hazardous waste container, located at HWAA 300-2. During the inspection, the sink was open to the atmosphere, but was not actively accumulating hazardous waste. The inspection team suggested that the sink could be viewed as an open container, and recommended covering the sink when waste is not being added, or removed.

At HWAA #300-2, the inspection team observed:

one 55-gallon container marked as hazardous waste, plating solution/water, 6/26/06;

one 55-gallon container marked as hazardous waste, plating debris.

RECORD REVIEW:

Manifests

manifest document #	amount	description	waste code	date	signer
mam507715	70 lbs	naptha	D004,8,6,30	6/3/05	Dennis Gagnon(DG)
mam507748	5552 lbs	hw solid lead	D008	3/3/05	DG
	3 drums	hw merc, lead	D008,9		
	3 drum	hw merc, lead	D008,D009		
	16 drums	hw merc, lead	D008,D009		
mam507752	386 lbs	waste caustic	D002	3/18/05	DG
	9 lbs	corr solid	MA99		
	6 lbs	sodium and potassium chlorate	D001		
	6 lbs	sodium cyanide	D002, D003		
mam507772	220 lbs	hw liquid	D004,6,8,10	5/10/05	stepen mitchell
	1220 lbs	non-reg	MA99 (profile 9065L)		
	1804	non-reg	MA99 (profile 9065)		
mam507783	20 boxes	fluor bulbs	D009	8/4/05	DG
mam507796	90 lbs	lead, asbestos	D008	10/13/05	DG
	10 lbs	silver nitrate	D10, D11		
	110 lbs	hydrogen peroxide	D001, D002		
mam507804	172 lbs	lithium batteries	D003,D007	12/13/05	DG
	190 lbs	hw solid	D002		
	7435 lbs	hw solid	D008		
	1224 lbs	batteries wet	D002, D008		
mam507807	10 lbs	sodium cyanide	D002, D003	1/25/06	DG
	10 lbs	sodium nitrate, potassium chlorate	D001		
	7 lbs	" "	D001		

	28 lbs	mercury, silver	D008, D009, D010, D011		
mam507810	454 lbs	epoxy resin	MA99 (profile 9016)	not documented	DG
	593 lbs	"AFFF"	MA99 (profile 9006)		
	230 lbs	corr preventative	MA99 (profile 9004)		
mam507813	6 lbs	silver nitrate	D001, D011	3/7/06	DG
	22 lbs	hydrazine	U133		
	121 lbs	hydrogen peroxide	D001, D002		
mer187353	1149 lbs	hw solid	D005	5/24/06	DG
meal9431	18,172 lbs	hw solids	D008	4/17/06	DG
	11,265 lbs	waste paint	D001,D004, D005,D006		
meal91446	2902	waste paint	D001,D035	4/17/06	DG
	556 lbs	waste adhesives	D001,D007, D021,D035		
	not doc	p dichlorobenzene	U072		
	not doc	ammonia, amine	D001, D002		
meal91495	256 lbs	waste paint	D001,D006	not documented	Douglas Smith
	257 lbs	waste adhesives	D001,D007, D035		
	not doc	waste solids	D001, D018		
	not doc	waste flamm liquid (gas)	D001,D018		
meal91498	5513 lbs	hw liquid	D001,D005, D006,D007	not doc	Stephen Mitchell

Land Disposal Restrictions

Land Disposal Restriction Notifications were selected randomly and reviewed during the manifest review. All notifications appeared to be in order.

Inspections

Inspections for the hazardous waste accumulation areas were reviewed while at the areas. Inspections for the licensed facility were also reviewed. All inspection logs appeared to be in

order and were signed by designated staff.

Training

The training plan for the hazardous waste facility was reviewed by Richard Hull. Training Course #58200 A3 included

- duty of hw handlers
- requirements at hazardous waste accumulation areas;
- identifying hazardous waste;
- labeling of containers
- hazardous waste inspections
- storage and transfer of waste
- spill response

Initial training was provided on 6/21/06, 4/17/06, and 2/27/06. Training Course #58200 RQ is provided as the annual refreshing course. This training is provided at multiple times during the year to accommodate all employees with hazardous waste duties. Refresher training was provided on 4/25/06, 3/21/06, 2/21/06, 1/10/06, and 1/9/06.

The inspection team also reviewed the training for the persons responsible for the management of PNS's mixed radioactive waste.

No issues were noted in PNS's training program.

Spill History

A spill on 6/28/06 of 1.5 gallons of hydraulic oil was reported. Initial spill was cleaned up with speedi-dry. No other spill records events were documented.

Contingency Plan

The contingency plan for the facility was reviewed after the inspection. No issues were noted.

Waste Analysis Plan

The waste analysis plan was not reviewed during the inspection.

Closure Plan

The closure plan was not reviewed during the inspection.

Closing Conference:

A closing conference was held at the end of the inspection with the attendees that were present during the in-briefing. The inspection team reviewed a couple of minor issues, regarding labeling, satellite vs. < 90 day area management, and better labeling containers that have been determined by PNS to be non-regulated. PNS staff were extremely responsive and proactive in addressing all areas of concern.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NEW ENGLAND OFFICE
One Congress Street, Suite 1100 (SEP)
Boston, Massachusetts 02114-2023

MEMORANDUM

DATE: May 27, 2008

FROM: Peter Kudarauskas, Environmental Engineer
Toxics and Pesticides Unit

THRU: Sharon Hayes, Senior Enforcement Coordinator
Toxics and Pesticides Unit

TO: Anne Fenn, Federal Facilities Program Manager
Office of Environmental Stewardship

SUBJ: Asbestos NESHAP Inspection at Portsmouth Naval Shipyard, Kittery, ME

I. Background Information

A. Date of inspection: May 12 – 13, 2008

B. Weather Conditions: Cloudy. In the lower 50's°F.

C. U.S. EPA Representative(s): Peter Kudarauskas
Anne Fenn (May 12, 2008 only)
Sharon Hayes Anne Fenn (May 12, 2008 only)

D. State Representative(s): None

E. Asbestos Contractor: N/A

F. On Site Representative(s): Ken Plaisted, Environmental Department
Portsmouth Naval Shipyard

Ralph Hickson, Environmental Department
Portsmouth Naval Shipyard

Melissa Libby, Environmental Department
Portsmouth Naval Shipyard

George Gray, Branch Head – Public Works
Portsmouth Naval Shipyard

Chris Moore, Asbestos Program Manager
Portsmouth Naval Shipyard

Dennis Gagnon, Central Hazardous Waste Transfer Facility
Portsmouth Naval Shipyard

G. Facility Name, Address: Portsmouth Naval Shipyard
Kittery, ME 03802

II. Purpose of Inspection

The purpose of the inspection was to verify compliance with the Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements. The inspection was part of an EPA Federal Facilities inspection of the Portsmouth Naval Shipyard (PNSY) from May 12 to May 13, 2008. At the time of the inspection, there were no ongoing asbestos abatement projects.

III. Off-site Observations

EPA observed no signs of asbestos or demolition debris on the ground. There was one 20-cubic yard roll-off dumpster located at the Central Hazardous Waste Transfer Facility (Building # 357). The dumpster was covered and labeled as asbestos waste.

IV. Entry Procedures

The EPA inspection of the project was unannounced and part of a larger federal facilities inspection of the facility.

V. Inspection

A comprehensive asbestos survey of the entire shipyard was completed by PNSY personnel during the 1990's. Building surveys are updated as additional renovations are conducted. Prior to any renovation or demolition work, the building surveys are reviewed. If the building survey appears to be incomplete, a contractor is hired to conduct additional asbestos sampling.

Mr. Gray stated that 10 buildings are planned to be demolished during FY 2009. He also stated that a new full asbestos survey of each building would be completed prior to demolition.

According to Mr. Moore, the last abatement project at PSNY occurred during April 2008. Portland Diversified Services, Inc. of Portland, ME removed approximately 250 square feet of asbestos-containing roof flashing from the Officer's Club (Building #22). All abatement personnel were licensed by the Maine Department of Environmental Protection.

Mr. Moore stated that the newer submarines no longer contain large amounts of asbestos-containing material ("ACM"). He stated that the majority of ACM in submarines is found in fire doors and gaskets. Mr. Moore also stated that the amount of asbestos removed from a submarine during an overhaul (if any) is well below the Asbestos NESHAP reporting thresholds.

EPA inspected the 20-yard roll-off dumpster containing asbestos waste at the Central Hazardous Waste Transfer Facility (Building # 357). The dumpster was approximately half full with polyethylene bags and fiberboard drums of asbestos waste. At least two, approximately

35-gallon (4.7 cubic feet) bags contained dry, friable asbestos material, which was not sealed in leak-tight containers. The asbestos waste in these two bags was not double-bagged and the waste was sticking out of holes. The asbestos waste sticking out of the bags was dry and friable. Mr. Gagnon and another PNSY employee immediately double-bagged the asbestos waste. According to Mr. Plaisted and Mr. Gagnon there was no way to identify who generated the asbestos waste.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NEW ENGLAND OFFICE
One Congress Street, Suite 1100 (SEP)
Boston, Massachusetts 02114-2023

MEMORANDUM

DATE: May 27, 2008

FROM: Peter Kudarauskas, Environmental Engineer
Toxics and Pesticides Unit
Office of Environmental Stewardship

PFK

THRU: Sharon Hayes, Senior Enforcement Coordinator
Toxics and Pesticides Unit
Office of Environmental Stewardship

SHH

TO: Anne Fenn, Federal Facilities Program Manager
Office of Environmental Stewardship

SUBJ: Renovation Rule Inspection of Balfour Beatty – Portsmouth Naval Shipyard, Kittery, ME

Facility Address: 67 Philbrick Avenue, Kittery, ME 03904

Date of Inspection: May 13, 2008

Personnel Participating in Inspection:

Peter Kudarauskas, Environmental Engineer, EPA
Ken Plaisted, Director, Environmental Affairs, Portsmouth Naval Shipyard
Cindy Andry, Community Manager, Balfour Beatty – Portsmouth Naval Shipyard
Dale Ward, Facility Manager, Balfour Beatty – Portsmouth Naval Shipyard

Purpose of the Inspection:

This inspection was conducted to evaluate Balfour Beatty's compliance with Section 406(b) of the Toxic Substances Control Act, 15 U.S.C. § 2686(b), and its implementing regulations at 40 C.F.R. Part 745, Subpart E ("Renovation Rule") between May 2005 to May 2008.

Background:

From May 12 to 13, 2008, EPA conducted a federal facilities inspection of the Portsmouth Naval Shipyard ("PNSY") in Kittery, ME. The Renovation Rule inspection of Balfour Beatty occurred on May 13, 2008. Balfour Beatty is currently contracted with the Navy to renovate and manage military housing at PNSY.

Inspection:

On May 13, 2008, Mr. Kudarauskas met with Ms. Andry, Mr. Ward and Mr. Plaisted at Balfour Beatty's offices in Kittery, ME. Upon arrival, Mr. Kudarauskas presented his EPA Credentials to Ms. Andry and Mr. Ward. Mr. Plaisted was the PNSY escort. Mr. Kudarauskas explained that EPA planned to conduct a Renovation Rule Inspection regarding renovations to pre-1978 housing by Balfour Beatty. Ms. Andry signed the TSCA Notice of Inspection form and the TSCA Inspection Confidentiality Notice. Ms. Andry was given a copy of EPA's Small Business Information Sheet.

Balfour Beatty is a United Kingdom-based international engineering, construction, investment and services group. On April 30, 2008, Balfour Beatty acquired GMH Military Housing, which was originally contracted with the Navy to renovate and manage military housing at PSNY.

There are 229 military housing units at PSNY. There are 200 housing units located off-base in Admiralty Village (Kittery, ME) and 29 units located on-base (Seavy Island, ME). All 200 units in Admiralty Village were constructed after 1978 and are not subject to the Renovation Rule. The 29 on-base units were all constructed prior to 1978 and are subject to the Renovation Rule:

Quarters	Year Built	Unit Type
A	1815	Single Family
B	1834	Single Family
C	1834	Duplex
D	1834	Duplex
E	1833	Duplex
F	1833	Duplex
G	1828	Rowhouse
H	1828	Rowhouse
H3	1917	Single Family
H4	1917	Single Family
H5	1917	Single Family
H27	1945	Single Family
I	1828	Rowhouse
J	1828	Rowhouse
K	1857	Farmhouse
L	1864	Farmhouse
M	1850	Single Family
N	1840	Single Family
O	1901	Single Family
P	1901	Single Family
Q	1914	Single Family
S	1840	Single Family
V	1840	Single Family
W	1840	Single Family
X	1919	Single Family
Y	1870	Single Family
68	1840	Single Family
192A	1944	Duplex
192B	1944	Duplex

Balfour Beatty employees complete the majority of maintenance work orders. Mr. Ward stated that the most maintenance work orders consist of small odd jobs such as no heat calls, clogged toilets, and leaky faucets. Mr. Ward stated that Balfour Beatty may subcontract out some maintenance work orders such as repairs of heating, ventilation and air conditioning (HVAC) systems.

EPA reviewed the maintenance folders for 19 of the 29 on-base housing units from May 2005 to May 2008. EPA identified 7 renovation projects where more than 2 square feet of painted surface was disturbed and there was no confirmation of receipt of EPA's lead pamphlet. The following table summarizes the aforementioned renovation projects:

Project Location	Scope of Work	Project Dates	Comments
Quarters I	Plug leak around chimney on 3 rd floor. Scrape and paint approximately 2 ft ² area of ceiling.	Work Order#: LL365942 Date reported: 10/24/2005 Date started: 10/26/2005 Date completed: 10/26/2005	No confirmation of receipt of lead pamphlet.
Quarters F	Master bath leak, causing bubbles in foyer ceiling. Scrapped hall ceiling, applied two coats of plaster and paint.	Work Order#: LL514460 Date reported: 10/3/2006 Date started: 10/6/2006 Date completed: 11/16/2006	No confirmation of receipt of lead pamphlet.
Quarters F	Toilet leaking into the ceiling below. Removed bubbling wall area around tub. Applied plaster and paint to area.	Work Order#: LL473167 Date reported: 5/26/2006 Date started: 5/31/2006 Date completed: 6/5/2006	No confirmation of receipt of lead pamphlet.
Quarters V	Repair loose stair treads. Removed ceiling in stairway to install braces. Installed new sheetrock. Applied plaster and paint.	Work Order#: LL347938 Date reported: 9/21/2005 Date started: 9/22/2005 Date completed: 10/4/2005	No confirmation of receipt of lead pamphlet.
Quarters V	Water dripping through ceiling from 2 nd floor to 1 st floor. Removed and replaced damaged ceiling.	Work Order#: LL516316 & LL517465 Date reported: 10/20/06 Date started: 10/20/06 Date completed: 11/16/06	No confirmation of receipt of lead pamphlet.
Quarters N	Dead rodent in wall. Removed and replaced drywall.	Work Order#: 249570 Date reported: 1/8/2007 Date started: 1/8/07 Date completed: 2/5/07	No confirmation of receipt of lead pamphlet.
Quarters H5	Roof leaking causing wet drywall in bathroom. Repaired leak, removed and replaced bathroom ceiling.	Work Order#: LL349205 Date reported: 8/22/2005 Date started: 9/7/2005 Date completed: 9/21/2005	No confirmation of receipt of lead pamphlet.

Copies of the work orders are attached.

Ms. Andry stated that tenants of on-base housing do receive a copy of EPA's Lead Paint Pamphlet, but Balfour Beatty does not document the pamphlet delivery with a confirmation of receipt or self-certification of delivery. Ms. Andry stated that she was unaware of the delivery documentation requirement (see attached statement given by Ms. Andry).

Conclusion

Balfour Beatty did not document delivery of EPA's lead pamphlet to owners/tenants of 7 renovation projects subject to the Renovation Rule from May 2005 to May 2008. As a result of the inspection, Balfour Beatty has begun documenting the delivery of EPA's lead hazard information pamphlet to tenants.



U.S. ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME <i>Balfour Beatty Portsmouth Naval Shipyard</i>
DATE <i>5/13/2008</i>	INSPECTION NO. <i>051308</i>	DAILY SEQ. NO. <i>1</i>	
2. INSPECTOR'S ADDRESS Peter F. Kudarauskas U.S. Environmental Protection Agency - Region 1 1 Congress Street - Suite 1100 Boston, MA 02114-2023 TEL: 617-918-1404			4. FACILITY ADDRESS <i>67 Philbrick Avenue Kittery, ME 03904</i>

For Internal EPA use. Copies may be provided to recipient as acknowledgement of this notice.

REASON FOR INSPECTION

This inspection involves the review of records, files, papers, facilities and shall include taking of samples, photographs, statements and other inspections activities as required by TSCA 406.

In addition, this inspection extends to (check appropriate blocks):

☒ A. Renovation records

☒ D. Paint inspections, risk assessment, hazard screens, tests, clearance and clean-up procedures

☒ B. Notifications

☒ E. Certification data

☒ C. Written acknowledgements

☒ F. Contracts and/or service agreements

The nature and extent of the inspection of such data specified in A through F above is as follows: to determine compliance with Title IV, Section 406(b) of the Toxic Substances Control Act (TSCA).

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

INSPECTOR'S SIGNATURE <i>P. F. Kudarauskas</i>		RECIPIENT'S SIGNATURE <i>C. Andry</i>	
NAME Peter F. Kudarauskas		NAME Cindy Andry	
TITLE Inspector	DATE SIGNED <i>5/13/08</i>	TITLE Community Manager	DATE SIGNED <i>5/13/08</i>



U.S. ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE 5/13/2008	INSPECTION NO. 051308	DAILY SEQ. NO. 1	Bal four Beatty Portsmouth Naval Shipyard
2. INSPECTOR'S NAME Peter F. Kudarauskas			5. FACILITY ADDRESS 67 Philbrick Avenue Kittery, ME 03904
3. INSPECTOR'S ADDRESS U.S. Environmental Protection Agency - Region 1 1 Congress Street - Suite 1100 Boston, MA 02114-2023			6. NAME OF CHIEF EXECUTIVE OFFICER Cindy Andry
			7. TITLE Community Manager

For Internal EPA use: Copies may be provided to recipient as acknowledgement of this notice.

TO ASSERT A TSCA CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during the inspection of the facility cited above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the EPA Administrator determines that the data is entitled to confidential treatment, or may be withheld from release under the exemptions of FOIA.

Any or all information collected by EPA during the inspection may be claimed as confidential if it relates to trade secrets, commercial, or financial matters that you consider to be confidential business information (CBI). If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of CBI. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information claimed as CBI.

A claim may be asserted at any time prior to, during, or after the information is collected. This notice was developed by EPA to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationary or by making the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this notice. The inspector will be glad to answer any questions you may have regarding EPA's CBI procedures.

While you may claim any collected information as CBI, such claims are not likely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information and it intends to continue to take such measures.
2. The information is not, and has not been, reasonable obtainable without your company's consent by other persons (other than governmental bodies), or by use of legitimate means (other than discover based on showing of special need in a judicial or quasi-judicial proceeding).

3. The information is not publicly available elsewhere.

4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is CBI.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your company within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive CBI treatment.

The statement from the Chief Executive Officer should be addressed to:

Peter Kudarauskas
U.S. Environmental Protection Agency - Region 1
1 Congress Street - Suite 1100
Boston, MA 02114-2023

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this notice. Claims may be made at any time after the inspection, but the inspection data will not be entered in the TSCA/CBI security system until an official confidentiality claim is made. The data will be handled under EPA's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE

I acknowledge receipt of this notice:

SIGNATURE

NAME

TITLE

DATE SIGNED

If there is no one on the premise who is authorized to make CBI claims for this facility, a copy of this notice and other inspection materials will be sent to the company's Chief Executive Officer. If there is another official who should also receive this information, please designate below.

NAME

TITLE

ADDRESS

**GMH Military Housing
MRI Work Order Details****NSY Portsmouth - On-Base Portsmouth****Work Order ID:** LL365942**Current Status:** In Process**Date Reported:** 10/24/2005 9:07:53 AM**Date Scheduled:** Not Scheduled**Resident Name:** Katherine Ulrich**Phone:** 439-6709**Community:** On-Base Portsmouth**Address:** QTRS I 1 Navy Shipyard Road**Description:** Paint problem in Bathroom 3**Problem Category:** Painting Repairs**Priority:** C**Assigned To:****Notes:** bath on 3rd floor has paint peeling on wall behind tub.

To be filled out by Maintenance Technician (please fill all information)

Completed By:

Bill Lamprell

Date Arrived at Residence:

10.24.05

Time:

see below

Date Completed:

10.26.05

Time:

see below

How long did it take to complete:

35 min.

Notes:

10.24.05/10:30-10:45 INSPECTED SITUATION. PAINT CRACKING OFF IN PLACES. MINOR ISSUE BUT IN APPROX. 2 SQ. FT. AREA PLUS LEAK AROUND CHIMNEY 3RD FLOOR

10.26.05/10:20 - 10:40 SCRAPED, PAINTED, CLEANED UP.

Signature: _____



GMH Military Housing MRI Work Order Details

NSY Portsmouth - On-Base Portsmouth

Work Order ID: LL514460

Current Status: In Process

Date Reported: 10/3/2006 9:20:09 AM

Date Scheduled: 10/6/2006

Resident Name: Mary Thomas

Phone: 439-3736

Community: On-Base Portsmouth

Address: QTRS F 1 Navy Shipyard Road

Description: Plumbing problem

Problem Category: All Plumbing Repairs

Priority: B

Assigned To: William Lamprell

Notes: master bath again leaking & causing ceiling in foyer to bubble ALOT

To be filled out by Maintenance Technician (please fill all information)

Completed By:	Bill Lamprell		
Date Arrived at Residence:	10.6.06	Time:	11:30 AM
Date Completed:	11.16.06	Time:	5:30 PM
How long did it take to complete:	7 hrs. 5 min.		

Notes:

APPOINTMENT: 10.5.06/9:00 CANCELED

10.6.06/9:30 - 11:20 CLEARED OFF DAMAGED CEILING/CUT HOLE FOUND LEAK 1 5

1:05 - 2:40 MADE PANEL, FIXED LEAK INSTALLED PANEL 1 3

NEED TO LET CEILING DRY THROUGH W/LY

10.30.06/9:05 CALLED LEFT MESSAGE.

APPOINTMENT 10.31.06 / AM

11.1.06/8:45 - 9:25 - SCRAPED HALL CEILING & APPLIED 1ST COAT OF PLASTER.

11.8.06/10:50 - 11:10 SECOND COAT OF PLASTER.

11.15.06/1:00 - 2:40 SAND PRIMER

11.16.06/9:00 - 10:00 FINAL PAINT

Signature: _____

Printed on 10/3/2006 1:01:48 PM



GMH Military Housing MRI Work Order Details

NSY Portsmouth - On-Base Portsmouth

Work Order ID: LL473167

Current Status: In Process

Date Reported: 5/26/2006 7:11:19 AM

Date Scheduled: 5/31/2006

Resident Name: MaryThomas

Phone: 439-3736

Community: On-Base Portsmouth

Address: QTRS F 1 Navy Shipyard Road

Description: Water Intrusion problem in Bathroom (Master)

Problem Category: Water Intrusion

Priority: B

Assigned To: William Lamprell

Notes: I think the toilet is leaking into/onto the ceiling below this room.

To be filled out by Maintenance Technician (please fill all information)

Completed By:

Bill Lamprell

Date Arrived at Residence:

5.31.06

Time:

Date Completed:

6.5.06

Time:

How long did it take to complete:

3 hrs. 40 min.

Notes:

5.31.06/10:05 - 12:20

REMOVED BUBBLING WALL AREA AROUND TUB SURROUND & SEALED. CLEANED OUT AND RECALLED ENTIRE TUB AREA. APPLIED TEFLON TAPE TO SHOWER EXTENSION IN WALL. CLEANED UP. WILL NEED TO GO BACK TO PLASTER AREA, SEAL THAT & TOP COAT PAINT.

2 hr. 15m

1:50 - 2:40

APPLIED MUD TO SCRAPED AREA.

50m

6.1.06/1:30 - 2:10

SCURED MUD. - STILL WET.

40m

6.2.06/2:50 - 3:15

FILLED & PRIMED

25m

6.5.06/11:45 - 12:15

FINAL PAINT.

30m

2 160

3 40

Signature: _____



GMH Military Housing MRI Work Order Details

NSY Portsmouth - On-Base Portsmouth

Work Order ID: LL347938

Current Status: In Process

Date Reported: 9/21/2005 9:10:58 AM

Date Scheduled: 9/21/2005

Resident Name: Hicks, Eric D

Phone: 439-7212

Community: On-Base Portsmouth

Address: QTRS V 1 Navy Shipyard Road

Description: Stairs

Problem Category: Safety/Liability/Smoke Alarms

Priority: B

Assigned To: William Lamprell

Notes: Check stairs for loose tread and repair as needed

To be filled out by Maintenance Technician (please fill all information)

Completed By:

William Lamprell

Date Arrived at Residence:

9-22-05

Time:

10:00

Date Completed:

Time:

5:30

How long did it take to complete:

Notes:

APPOINTMENT: 9.22.05/9:00am

9.21.05/9:30-9:45 INSPECTION

9.22.05/9:00-12:15 REMOVE CEILING IN STAIRWAY
BUILD & INSTALL BRACES, INSTALL
SHEET ROCK & 1ST COAT OF W.D.

9.23.05/9:50-10:00 INSPECTED AREA TOO WET TO W.D.

9.27.05/9:15-9:30 SECOND COAT OF PLASTER

APPOINTMENT/10.3.05 CALL FIRST 9:20-10:00 SAND, PRIME & CLEANUP

10.4.05/8:20-8:55 FINAL COAT OF PAINT

Signature: _____

Printed on 9/21/2005 9:11:22 AM



GMH Military Housing MRI Work Order Details

NSY Portsmouth - On-Base Portsmouth

Work Order ID: LL516316
Current Status: In Process
Date Reported: 10/23/2006 8:28:27 AM
Date Scheduled: 10/20/2006
Resident Name: Jamie Hicks
Phone: 439-7212
Community: On-Base Portsmouth
Address: QTRS V 1 Navy Shipyard Road
Description: Water Intrusion problem
Problem Category: Water Intrusion
Priority: B
Assigned To: William Lamprell
Notes: water is dripping through the ceiling from 2nd floor to 1st floor E-call

To be filled out by Maintenance Technician (please fill all information)

Completed By:	Bill Lamprell		
Date Arrived at Residence:	10.20.06	Time:	5:30 AM
Date Completed:	10.31.06	Time:	11:10 AM
How long did it take to complete:	5 hr. 55 min.		

Notes:

10.20.06/11:45^{PM} - 12:50 AM INSPECTED SITUATION. DRAINED WATER FROM CEILING. WILL NEED TO GO BACK TO REPAIR CEILING. 11:51
 10.23.06/9:45 - 11:45 REMOVED DAMAGED CEILING. FIXED RAPIDATOR 2L. LEAK/PACKING OUT. (ALL WED. WORKING)
 10.30.06 APPOINTMENT 1:00 - 2:40 RESHEETED CEILING & MAPPED
 10.31.06/10:00 - 11:10 SECOND COAT OF PAINT 11:40
 11:10

Signature: _____

Printed on 10/23/2006 8:38:48 AM



31 1/2 x 78 SCREEN DOOR SIZE



GMH Military Housing MRI Work Order Details

NSY Portsmouth - On-Base Portsmouth

Work Order ID: LL517465

Current Status: In Process

Date Reported: 10/31/2006 4:22:17 PM

Date Scheduled: 11/2/2006

Resident Name: Hicks

Phone: 439-7212

Community: On-Base Portsmouth

Address: QTRS V 1 Navy Shipyard Road

Description: Unidentified problem

Problem Category:

Priority: C

Assigned To: William Lamprell

Notes: Please put in work order to finish repairs at Qtrs-v Per Mike Riley

To be filled out by Maintenance Technician (please fill all information)			
Completed By:	Bill Lamprell		
Date Arrived at Residence:	11.1.06	Time:	5:45 PM
Date Completed:	11.16.06	Time:	5:45 PM
How long did it take to complete:	3 hrs. 40 min.		
Notes:			
11.1.06 / 9:40 - 10:30	3RD COAT OF PLASTER.		50
11.8.06 / 9:40 - 10:50	LAST COAT OF PLASTER		1 10
11.15.06 / 3:15 - 4:25	SAND & PRIME		30
11.16.06 / 10:00 - 10:30	FINAL PAINT		2 140

Signature: _____

Printed on 10/31/2006 4:32:46 PM



GMH Military Housing MRI Work Order Details

NSY Portsmouth - On-Base Portsmouth

Work Order ID: LL349205

Current Status: In Process

Date Reported: 9/22/2005 3:05:55 PM

Date Scheduled: 9/7/2005

Resident Name: Ross, Christopher

Phone: 439-7782

Community: On-Base Portsmouth

Address: QTRS H-5 1 Navy Shipyard Road

Description: roof leak

Problem Category: Water Intrusion

Priority: C

Assigned To: William Lamprell

Notes: Drywall wet in bathroom from roof leaking

To be filled out by Maintenance Technician (please fill all information)

Completed By:	Bill Lamprell		
Date Arrived at Residence:	8.25.05	Time:	3:15
Date Completed:	9.21.05	Time:	Below
How long did it take to complete:	7 hrs. 50 min.		

Notes:

EXTENDED TIME TO COMPLETE DUE TO VACATION.

8.25.05/3:15-3:30 INSPECTED SITUATION

9.7.05/8:30-11:00 COMPLETELY TAPPED STINK PIPE & PUT RAIN CAP ON IT.

9.12.05/1:00-2:40 REMOVED CEILING IN BATHROOM RESHEET ROCKED & MUDDER

9.13.05/9:20-10:15 APPLIED SECOND COAT OF PLASTER.

9.14.05/11:00-11:30 APPLIED THIRD COAT OF PLASTER.

9.15.05/1:50-3:00 SAND & PRIME

9.20.05/1:00-1:30 PAINT WALLS

9.21.05/12:40-1:00 PAINT CEILING

Signature: _____

Printed on 9/22/2005 3:07:40 PM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NEW ENGLAND OFFICE

One Congress Street, Suite 1100 (SEW)
Boston, Massachusetts 02114-2023

STATEMENT

I, Cindy Andry, Community Manager, hereby state, under penalty of perjury pursuant to 28 U.S.C. Section 1746, the following:

Any interior repairs which require wall or ceiling repairs - Lead Paint Brochures are given to Residents - we were unaware of document receipt notification requirement.

I have read this document and agree that it is complete, truthful, and factually accurate in all regards to the best of my knowledge and belief.

Date: 5/13/08

Location: Balboa Beach Communities
67 Phibbrick Ave
Kittery Maine 03904
PM54

R. F. K.
(Witness)

C. Andry
(Affiant)



U.S. ENVIRONMENTAL PROTECTION AGENCY

Washington, DC 20460

RECEIPT FOR DOCUMENTS

1. INVESTIGATION IDENTIFICATION			3. FACILITY NAME
DATE 5/13/2008	INSPECTION NO. 051308	DAILY SEQ. NO. 1	Balfour Beatty Portsmouth Naval Shipyard
2. INSPECTOR'S ADDRESS Peter F. Kudarauskas U.S. Environmental Protection Agency - Region 1 1 Congress Street - Suite 1100 Boston, MA 02114-2023 TEL: 617-918-1404			4. FACILITY ADDRESS 67 Philbrick Avenue Kittery, ME 03904

For Internal EPA use. Copies may be provided to recipient as acknowledgement of the documents described below.

RECEIPT OF DOCUMENT(S) DESCRIBED IS HEREBY ACKNOWLEDGED

No.	DESCRIPTION
1	TSCA Notice of Inspection (5/13/08)
2	TSCA Inspection Confidentiality Notice (5/13/08)
3	List of ON-Base Housing
4	Work Order LL 365942 (Quarters I)
5	Work Order LL 514460 (Quarters F)
6	Work Order LL 473167 (Quarters F)
7	Work Order LL 347938 (Quarters V)
8	Work Order LL 516316 (Quarters V)
9	Work Order LL 517465 (Quarters V)
10	Work Order LL 452725 (Quarters V)
11	Work Order 249570 (Quarters N)
12	Work Order LL 349205 (Quarters H)
13	Statement by Cindy Andry (5/13/08) — NOTHING FOLLOWS —

OPTIONAL:

DUPLICATE COPIES: REQUESTED AND PROVIDED ☒NOT REQUESTED ☐

INSPECTOR'S SIGNATURE 		RECIPIENT'S SIGNATURE 	
NAME Peter F. Kudarauskas		NAME Cindy Andry	
TITLE Inspector	DATE SIGNED (5/13/2008)	TITLE	DATE SIGNED 5/13/08